



LUNDS & BYERLYS

May 26, 2023

Ms. Susan Poulsom and Mr. Brian Nickel
Water Division, NPDES Permitting Section
US EPA Region 10
1200 Sixth Avenue, Suite 155
Seattle, Washington 98101

Subject: Public Notice Comments: NPDES Permit No. WA0050202
Washington Beef, LLC - Toppenish Plant

Dear Ms. Poulsom and Mr. Nickel:

I am submitting this letter on behalf of Lunds & Byerlys to share our company's concerns about the new standards that have been set by the Environmental Protection Agency for Washington Beef's operations.

For a bit of background about our company, we have 28 grocery stores throughout the Twin Cities and surrounding communities with nearly 4,000 team members who take us to market every day. My grandfather founded our company in 1939, and we take a tremendous amount of pride in being a multi-generational, family-owned company. Nearly 15 years ago we set out to find a new beef supplier, and we discovered what we consider to be a generational partnership with Washington Beef because of their shared family values and commitment to quality and integrity.

Our concern today centers around the EPA changing some of its environmental regulations for Washington Beef's operations through a permit instead of the typical and transparent rulemaking process that includes the opportunity for Washington Beef and the community to participate in the process. Furthermore, the EPA has cited no justification or previous violations to support these environmental regulation changes.

Washington Beef is well known for producing the highest-quality beef through their multiple brands, including Snake River Farms American Wagyu Beef and Double R Ranch Northwest Beef. These newly created standards in the permit could negatively impact our customers and the high-quality beef we offer to our customers.

As a long-time retail partner with Washington Beef, we have witnessed firsthand their dedication to quality, commitment to environmental consciousness and to doing the right thing. Washington Beef has consistently demonstrated a deep commitment to maintaining high standards in their operations, which

has resulted in a positive impact to their local economy, employment opportunities, and processing opportunities for hundreds of ranching families.

Any new regulations should consider the longstanding positive contributions Washington Beef has made in Washington and around the country. Washington Beef is a key part of the economy in the Northwest and a counterbalance to the major packers that already dominate the beef-packing industry.

We are concerned the standards created in the new permit were not created in the existing rulemaking process. As we understand it, the rulemaking process provides for transparency and would give Washington Beef the opportunity to work directly with technical experts from the EPA. It would also provide customers and the broader community an opportunity to participate in the process.

The EPA's proposed changes in applicable water quality standards look to be both unattainable and unnecessary, which puts Washington Beef and Washington state's economy at risk. The loss of this employer, a positive contributor to the community and a critical partner supplying our customers with high-quality beef, would be devastating. And it would leave our company with lower quality options and less choice.

We are respectfully asking the EPA to take a step back and go through the proper process so they can receive public input and technical information to identify a workable solution for water quality standards that align with how the facility has been historically regulated. Taking these steps would continue to help our environment while also continuing to ensure Washington Beef is able to supply the long-term needs of its many customers, including us.

Thank you for your consideration of my comments on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tres Lund".

Russell T. Lund, III (Tres)
President & CEO

Cc:

Representative Angie Craig
Representative Tom Emmer
Representative Russ Fulcher
Representative Cathy McMorris Rogers
Representative Kim Schrier